

Tara Hall

From: James Goodwin <JFG@blancolaw.com>
Sent: Thursday, October 5, 2023 6:48 PM
To: RentalHelp
Subject: 2024 First Draft QAP Comment

Hi Tara, I respectfully submit the following comment to the draft 2024 QAP:

Under current Section V(B)(4), an applicant is eligible for an award of tax-exempt bond volume if at least one Principal has successfully placed in service either: (a) one 9% project in North Carolina, or (b) one tax-exempt bond project in any state, within a given timeframe. In contrast, under current Section 4(D)(1)(a), an applicant is eligible for an award of 9% tax credits if at least one principal has successfully placed in service either (a) one 9% project in North Carolina, or (b) **six separate tax credit projects in excess of 200 units** in that timeframe. My comment is to revise Section V(B)(4) to allow a Principal to qualify for an award of tax-exempt bond volume if they have successfully placed **six separate tax credit projects in excess of 200 units** in service during the applicable window. If one in-state project is considered the equivalent of six out-of-state projects for 9% qualifying purposes, then it should also be deemed equivalent for purposes of qualifying for an award of tax-exempt bond volume.

Thank you for your consideration.

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